

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

POWERDSINE, INC. and POWERDSINE, LTD.,

Plaintiffs,

-against-

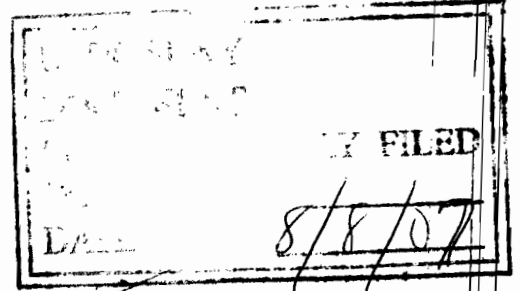
AMI SEMICONDUCTOR, INC. and AMI
SEMICONDUCTOR BELGIUM BVBA,

Defendants.

PROPOSED SCHEDULING ORDER

C A No. 07 Civ. 6014(SAS)(FM)

Conference Date: August 6, 2007



WHEREAS, the Court issued an Order for a Conference in accordance with Fed. R. Civ. P. 16(b) on July 11, 2007 (the "Order"); and

WHEREAS, the Order requires that the parties jointly prepare and sign a proposed scheduling order containing certain information;

NOW, THEREFORE, the parties hereby submit the following information as required by the Order:

(1)	Conference Date:	August 6, 2007
	Appearing for Plaintiffs:	Walter Hanchuk Dennis Hopkins
	Appearing for Defendants:	Michael A. Oblon Brian S. Fraser

(2) Concise statement of the issues as they presently appear:

Plaintiffs PowerDsine, Inc. and PowerDsine, Ltd. allege that Defendants AMI Semiconductor, Inc. and AMI Semiconductor Belgium BVBA breached an agreement amongst the parties by misappropriating Plaintiffs' confidential and proprietary information and by

competing with Plaintiffs' business. Plaintiffs PowerDsine, Inc. and PowerDsine, Ltd. also allege that Defendants AMI Semiconductor, Inc. and AMI Semiconductor Belgium BVBA tortiously interfered with a contractual relationship by wrongfully and intentionally inducing a former employee of Plaintiff PowerDsine, Ltd. to breach a confidentiality and non-disclosure agreement.

By stipulation of the parties, Defendants AMI Semiconductor, Inc. and AMI Semiconductor Belgium BVBA's time to answer, move or otherwise respond to the First Amended Complaint has been extended from August 9, 2007 to August 17, 2007.

Defendants AMI Semiconductor, Inc. and AMI Semiconductor Belgium BVBA continue to evaluate the counts in the First Amended Complaint and are evaluating counterclaims and potential claims against third-party defendants. Additionally, Defendants are evaluating the propriety of hearing Plaintiffs' second count for alleged tortious interference with contract in a U.S. court, because that count solely involves the application of foreign law.

(3) Schedule:

(a) The parties expect to depose the following witnesses:

Plaintiffs:

30(b)(6) Witnesses

Shimon Elkayam (third party witness)

Sharon Dagan (AMI Semiconductor Belgium BVBA)

Enrico Corti (AMI Semiconductor Belgium BVBA)

Bertrand Arnoux (AMI Semiconductor Belgium BVBA)

Defendants:

30(b)(6) Witnesses

Shimon Elkayam (third party witness)

Nadav Barnea (PowerDsine, Ltd.) (Israel)

Assaf Silberstein (PowerDsine, Ltd.)

Various current and former employees of Broadcom Corp.

Plaintiffs:

Geert Vanherzeele (AMI
Semiconductor Belgium BVBA)

Pascal Verduyssc (AMI
Semiconductor Belgium BVBA)

Various current and former
employees of AMI
Semiconductor, Inc.

Various current and former
employees of AMI
Semiconductor Belgium BVBA

Various current and former
employees of Broadcom Corp.

Defendants:

Various current and former
employees of PowerDsine,
Ltd.

Various current and former
employees of PowerDsine, Inc.

Because this dispute involves an Israeli company and a Belgian company with employees in Europe, the parties anticipate that some depositions may proceed under the Hague convention, which may affect discovery timing. At this time, depositions dates have not yet been scheduled;

(b) By August 17, 2007, the parties shall serve Initial Disclosures. Any such disclosures that a party contends contains confidential information shall be so identified, and shall be considered "Confidential, Outside Counsel Attorneys Eyes Only," pending entry of a Protective Order;

(c) As discussed in section (4) below, Plaintiffs and Defendants disagree about a proposed requirement for Plaintiffs to serve Initial Contentions;

(d) By September 14, 2007, discovery will commence. By that date, the parties shall submit to the Court for approval a Stipulation and Protective Order

addressing confidential matters, or otherwise jointly move for a Protective Order by a motion addressing the parties' points of agreement and disagreement;

(e) Expert reports shall be served no later than February 14, 2008. Rebuttal expert reports shall be served no later than March 14, 2008. Expert witness depositions shall be completed by April 11, 2008;

(f) Discovery shall be completed by May 9, 2008;

(g) Plaintiffs shall serve its pretrial order matters to Defendants by June 6, 2008;

(h) The parties shall submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and proposed findings of fact and conclusions of law for a non-jury trial; and

(i) A final pre-trial conference pursuant to Fed. R. Civ. P. 16(d) will be held on: February 7, 2008 at 4:30pm;

(4) a statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement:

Defendants propose that, in lieu of the Defendants filing a Motion For More Definite Statement under F.R.C.P. 12(e), by September 7, 2007, Plaintiffs shall serve Initial Contentions identifying each alleged trade secret that Plaintiffs contend has been misappropriated, including the respective means by which each was alleged to have been misappropriated. Such Initial Contentions shall be considered "Confidential, Outside Counsel Attorneys Eyes Only," pending entry of a Protective Order;

Plaintiffs object to Defendants' proposal.

(5) Anticipated fields of expert testimony:

Integrated circuit design and manufacturing
Damages

(6) Anticipated length of trial:

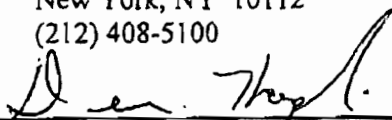
Two weeks

Plaintiffs and Defendants request a bench trial.

(7) This Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires;

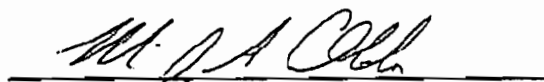
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August 7, 2007

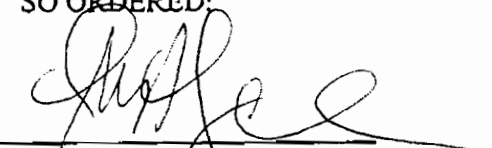
For Defendants:

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August 7, 2007

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SO ORDERED:


SHIRA A. SCHEINDLIN
U.S.D.J.